APPENDIX B

SUMMARY OF SCOPING COMMENTS

During the scoping period of the environmental impact statement (EIS), the Montana Department of Environmental Quality (DEQ) and the project sponsors conducted five public meetings (see Section 1.3) and consulted with local, state and federal agencies (see Chapter 6) to seek input regarding the proposed Silver Bow Generation Project. The following issues of concern were expressed by the public and consulting agencies during the scoping process.

Socio-Economic Issues of Concern

1. While a few people in Butte may see short-term financial benefits, the long-term effects on them and the immediate and long-term impacts on the rest of Montanans could be detrimental due to the following reasons:
   - Because Continental Energy Systems (CES) proposes to provide electrical power to the highest bidder, the proposed facility will not reduce the cost of electricity to Montana consumers. As a result, Montana will pay for the proposed project through increased environmental impacts, but not receive a power cost reduction benefit.

   - The increased transmission capacity proposed for the Montana Power Company (MPC) pipeline is not needed. The new 20-inch pipeline would transport twice the capacity of the existing 16-inch pipeline now servicing Butte, yet that pipeline is running at 75 to 87 percent capacity. Ratepayers will be paying a portion of the cost associates with the proposed upgrade but the project will not benefit the ratepayers.

   - The price of natural gas will increase due to increased demand from gas-fired generation plants such as the proposed project. As a result, the rate for residential users will increase with no benefit to the ratepayers.

2. The Dearborne River is a major spawning tributary for the Missouri River trout population, and as such, an extensive and multi-million dollar local economy has evolved to service the increasing number of anglers on the Missouri River. It is requested that alternative analyses include the level of risk to the trout fishing economy and the jobs and investments it supports.

3. Will the electricity generated at the proposed plant stay in Montana or will it be sold to the highest bidder in the open market? If it is the latter case, will most of the power generated go to California?

4. Where is most of the gas coming from that flows through Cut Bank to Morel and on to the generation plant? Is the gas coming from Canada? How long is this source of natural gas projected to last?

5. What percentage of a tariff fee would be passed on to the public?

6. What part of the cost to construct the transmission power lines is paid by the public?

7. What percentage of the existing pipeline capacity is being used?

8. What is the cost comparison between the Silver Bow Generation Plant and the use of Colstrip energy?

9. The new facility will not reduce the cost of electricity to Montana's consumers.

Safety Issues of Concern

1. How safe is the proposed pipeline in a high-risk seismic zone such as the Helena area?

2. People living near the pipelines and compressor stations would be at great risk due to operating pressures involved; that is, pipeline pressures would be increasing from 200 to 300 pounds per square inch (psi) to 1,100 to 1,200 psi. Studies need to be performed to ensure that Montana residents are not harmed.

3. Are the newly proposed pipeline loops too close to the existing pipeline for safety during construction?

4. What happens when there is damage or a break in the gas pipeline?

5. How is the integrity of the pipeline tested? How often?

6. What happens when the pipeline has a major break or explosion?

7. What is the history of catastrophic failure (with deaths) at compressor stations?

8. How long have the existing pipelines been in place?

9. Is there a history of pipeline failures?

10. High-pressure underground pipelines can and often do kill nearby people when ruptures occur. Property damages to individuals and resulting forest fires in affected areas would be devastating.

Noise Issues of Concern

1. How noisy is the compressor station – what are the decibels at 100 feet?

2. Is 70 to 75 decibels a constant noise level? What level of noise is this?

3. How close would the Silver City compressor station be to homes?

Land Use Issues of Concern

1. Old low-pressure 20-inch pipeline easements do not cover the increased burdens to property owners posed by the proposed high-pressure pipeline.

2. Easements granted to public utilities using “Eminent Domain” statutes cannot be transferred to a private entity for profit. New easements must be renegotiated with landowners. There is no requirement that an individual grant an easement requested by a private non-governmental entity.

3. Compressor stations may be too noisy for local residents.

4. The land application and disposal process may preclude any other use of state land.

5. Roads, pipelines, powerlines, and general industrialization intrude on the landscapes where gas is drilled.

6. How does CES plan to actually move any new electricity generated, since our transmission lines are currently at capacity? Wouldn't this require building new transmission lines to transport the new capacity? And the transmission lines are actually much harder to build than the plants that generate the power.

Fisheries Issues of Concern

1. Open cut trench crossings of trout rivers threaten the health of trout habitat and the viability of the trout population in these streams and rivers: Dearborn River, Sun River, Little Prickly Pear Creek, Spring Creek, Big Coulee Creek and Flat Creek.

2. Open-cut trench crossings of trout rivers pose a considerable threat to the trout and ongoing recruitment. Directional drilling crossings under the waterways is strongly favored because it is non-invasive to the riparian ecosystem.

3. It is critical that the timing of any river crossing, no matter the method, be closely timed so that the least amount of potential disturbance to migrating adult and spawning and juvenile fish dropping to the Missouri River is accommodated.

4. CES should be required to go underground when the gas pipeline crosses rivers like the Dearborne, etc. The quality of streams such as these are an important part of what makes Montana one of the Last Great Places.

5. Stream restoration in Silver Bow Creek could be hampered by discharge of process wastewater from the proposed generation plant. Wastewater discharge from the project should be of a quality equal to or better than the proposed rehabilitated water quality in Silver Bow Creek. There is particular concern with thermal levels in wastewater; it is requested that EIS alternatives address proper trout sustaining temperatures in the wastewater discharge.

6. Reduction in instream flows in Warm Springs Creek to supply the proposed generation plant with adequate process water could affect the bull trout population (listed species under the Endangered Species Act).

7. Adverse impacts to bull trout and westslope cutthroat trout due to pipeline construction and reduction in instream flows.

Air Quality Issues of Concern

1. Air emissions from the generation plant and the compressor stations will not be safe.

2. Will salt be deposited from air emissions from the generation plant?

3. Greenhouse gases will be emitted by the project.

4. What do the exhaust emissions at a compressor station consist of?

5. Will the gas contain an odor (for leak detection)?

6. Over the long term, fossil fuel burning contributes to global warming. Over the short term, an important reason for not converting natural gas to electricity is that fossil fuels are non-renewable. There is a limit to the natural gas supply and it should not be squandered needlessly.

7. Air pollutants emitted by the plant will blow, on the prevailing west winds, into Butte, and cause significant degradation of air quality there. Is Butte included in the PM_{10} non-attainment area?

8. In accordance with ARM 17.8.822, Section 8, CES should conduct air quality analysis after construction of the generation plant to determine the effect of plant emissions on air quality in the City of Butte; get a neutral, third-party to perform the analysis.

Water Quality Issues of Concern

1. How will the land application and disposal process impact groundwater?

2. Trenched pipeline crossing will contribute sediment to surface water.

3. Waste water discharge to surface water from the generation plant will be too warm to support a fishery.

4. Existing water users may experience a reduction in flows in Warm Springs Creek.

5. Warm Springs Creek superfund goals may be delayed due to permitted discharges from the generation plant.

6. The interrelated nature of Silver, Twin, and Storm Lakes and Warm Springs Creek is a complicated water right and delivery system. A cumulative effects analysis of the proposed and alternative water delivery system's impacts is highly recommended. The analysis should quantify water rights and ownership; determine potential minimum and maximum water appropriation levels and potential impacts to lake and creek fisheries.

7. Can water from the Butte pit be used at the generation plant?

8. Is the volume of water needed at the generation plant an issue for the area around Butte?

9. There is a concern about taking water fro Georgetown Lake.

Soils Issues of Concern

1. The land application and disposal unit will damage a state soil resource.

Vegetation Issues of Concern

1. What are the effects of pipeline construction on perennial legumes?

2. What are the required revegetation and reclamation specifications for disturbances to vegetation?

3. The appearance of new unmanageable weeds should be the responsibility of those who brought them in.

4. Some weeds (such as leafy spurge) brought in by the pipeline construction may be very difficult to control or kill.

5. Maintenance inspections along pipeline route would increase the spread of unwanted weeds.

Geologic Issues of Concern

1. How is the seismic risk factor addressed?